

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
v.	:	
		<b>CRIMINAL NO. 2:20-cr-00064-RBS</b>
<b>ARA APRAHAMIAN,</b>	:	
<b>Defendant.</b>	:	

**UNITED STATES’S MOTION TO DISCLOSE  
GRAND JURY MATERIAL TO DEFENSE COUNSEL**

The United States respectfully moves the Court, pursuant to Fed. R. Crim. P. 6(e)(3)(E)(i), for an order authorizing the United States to disclose grand jury testimony to defendant and his attorneys, as part of discovery in this case, on the terms and conditions outlined below. In support of this motion, the United States provides the following:

1. Fed. R. Crim. P. 6(e), with various exceptions, prohibits the disclosure of “matters occurring before the grand jury.”
2. Defense counsel has requested grand jury transcripts.
3. Fed. R. Crim. P. 6(e)(3)(E)(i) allows for Court-authorized disclosure of matters occurring before a grand jury, when such disclosure is “preliminarily to or in connection with a judicial proceeding.”
4. The pending case against defendant is a “judicial proceeding” and the requested disclosure is “in connection with” such proceeding. The United States wishes to provide this discovery, but can do so only with the Court’s approval and order.
5. Because the grand jury proceedings (and the related transcripts and documents) remain secret, *see* Fed. R. Crim. P. 6(e), the United States moves that disclosure be allowed only for purposes of defending this case, and such disclosure be made to defendant and his attorneys

only; that such transcripts and exhibits be maintained in the defense attorneys' custody; that such materials shall not be reproduced or disseminated; and such materials be returned to the United States at the end of this case.

WHEREFORE, the United States respectfully requests that the Court authorize the disclosure of grand jury testimony to defendant and his attorneys, in the due course of providing discovery in this case and on the terms and conditions outlined above.

Respectfully submitted this 28th day of September 2023.

Respectfully submitted,  
/s/ Allison Gorsuch  
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Allison Mileo Gorsuch  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 28th day of September 2023, I electronically filed the foregoing **UNITED STATES’S MOTION TO DISCLOSE GRAND JURY MATERIAL TO DEFENSE COUNSEL** with the Clerk of the Court using CM/ECF which will send notification of such filing to counsel of record in the above-captioned matter.

/s/ Allison Gorsuch  
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